

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DEANNA JOHNSON,

Plaintiff,

v

No. 19-cv-10167

FORD MOTOR COMPANY,

Defendant.

/

JURY TRIAL - VOLUME IV

BEFORE THE HONORABLE GERSHWIN A. DRAIN
UNITED STATES DISTRICT JUDGE
Theodore Levin United States Courthouse
231 West Lafayette Boulevard
Detroit, Michigan
Tuesday, September 19, 2023

APPEARANCES:

For the Plaintiff:

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For the Defendant:

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Reported by:

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1 THE COURT: You're not going to get into the adequacy
2 of the investigation?

3 MS. LAUGHBAUM: No. And your Honor, here's the
4 reason: If Ford is able to sell to the jury this concept that
5 Ford didn't have notice until November 25th, you know, that's
6 game over. That's game over for plaintiff. Because by that
7 time it was way too late. It doesn't matter, from my
8 perspective, from plaintiff's perspective, what Ford did or
9 didn't do, because my client is out in a mental health crisis on
10 a medical leave.

11 So no, I'm not taking the position that their
12 investigation on November 25 and 26 was inadequate. It was just
13 a line of inquiry in a discovery deposition three or four years
14 ago. So, you know, defendant's concerns and alarmism is just
15 misplaced, and there's no reason for the instruction because
16 I'm not making any kind of argument.

17 THE COURT: Okay. If you say it's not an issue, I'm
18 going to accept your representation on that and that you're not
19 going to go into the adequacy of the investigation, nor the
20 Klauf case. Okay.

21 MS. LAUGHBAUM: Thank you, your Honor.

22 THE COURT: Let me just say this: We've got -- I've
23 kind of -- my timing has gotten all thrown off this morning,
24 because normally my court reporter, Merilyn, her substitute
25 comes in about 11:00. So, we're going to do about fifteen